

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,

Crim. No. 23-160(9) (NEB/JFD)

Plaintiff,

v.

**DEFENDANTS' JOINT MOTION  
FOR PRODUCTION OF WITNESS  
STATEMENTS**

JARRETT ROBINSON (9),  
CHRISTOPHER LEE WASHINGTON  
(31), ERNEST KETTER (32),  
RONNELL LOCKHART (40)

Defendant.

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Defendant Jarrett Robinson, through and by the undersigned counsel, moves the Court to issue an Order requiring the government to produce all rough notes related to their interviews of cooperating witnesses in this matter, prior to the close of testimony. Mr. Robinson's codefendants join in this motion.

Today, Counsel for Mr. Robinson's codefendant, Ernest Ketter, discovered during cross-examination that cooperating witness, Jovan Knight, disclosed information in an interview on Friday, June 13, about matters that were relevant to the government's case against Mr. Ketter. The government produced a one-page statement of what was discussed with Mr. Knight at that interview. That report failed to disclose certain information about an alleged kidnapping attempt by rival gang members.

In an attempt to cure this issue, the government voluntarily produced a statement by Investigator Voss, who was present during most of the interview of Mr. Knight. The report

is 6 pages long and contains substantial detail about what was said by the cooperating witness, including detail that is not reflected in the summary.

Pursuant to Federal Rule of Criminal Procedure 26.2 and the Jencks Act, 18 U.S.C §3500, Mr. Robinson requests all rough notes of interview of the cooperating coconspirators that have testified in this matter.

Dated: June 18, 2025

*/s/ Lousene M. Hoppe*

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Lousene M. Hoppe (#0387171)

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